

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROBERT MORGAN,

Plaintiff,

v.

NOVARTIS PHARMACEUTICALS
CORPORATION,

Defendant.

Civil Action No.: 1:08-cv-02343

**DEFENDANT'S DISCLOSURE
STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, counsel for Defendant, Novartis Pharmaceuticals Corporation (“NPC”), hereby discloses and certifies that, to the best of my knowledge and belief, the following is a complete list of NPC’s parent corporations and publicly held companies that own 10% or more of NPC’s stock:

1. Parent Companies:

- (a) Novartis Finance Corporation, a New York corporation;
- (b) Novartis Corporation, a New York corporation;
- (c) Novartis Holding, AG, a Swiss company; and
- (d) Novartis AG, a Swiss company, whose American Depository Shares are publicly traded on the New York Stock Exchange.

2. Publicly held companies owning more than 10% of NPC stock:

- (a) Novartis AG indirectly owns a 100% interest in NPC.

Dated: March 31, 2008

Respectfully submitted,

s/ Ethan D. Stein

Ethan D. Stein (ES-7130)
EStein@gibbonslaw.com
Diane E. Lifton (DL-9673)
GIBBONS P.C.
A Professional Corporation
One Pennsylvania Plaza, 37th Floor
New York, NY 10119-3701
Phone: 212-613-2000
Fax: 212-333-5980
*Counsel for Defendant Novartis
Pharmaceuticals Corporation*

Of counsel:

Joe G. Hollingsworth
Katharine R. Latimer
Robert E. Johnston
SPRIGGS & HOLLINGSWORTH
1350 I Street, NW, Ninth Floor
Washington, D.C. 20005
Phone: (202) 898-5800
Fax: (202) 682-1639

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2008, the Defendant's Disclosure Statement was filed with the Clerk of the Court and served in accordance with the Southern District's Rules on Electronic Service upon the following parties and participants:

Daniel A. Osborn, Esq.
Russel H. Beatie, Esq.
Philip J. Miller, Esq.
Beatie and Osborn LLP
521 Fifth Avenue, 34th Floor
New York, NY 10175

I further certify that on March 31, 2008, I served a true and correct copy of the foregoing Defendant's Disclosure Statement by United States Mail, postage prepaid, on:

The Powell Law Firm, L.C.
269 South Beverly Drive
Suite 1156
Beverly Hills, CA 90212

The Offices of Jeffrey C. Bogert
501 Colorado Boulevard
Suite 208
Santa Monica, CA 90401

s/ Ethan D. Stein
Ethan D. Stein